

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

JOHN DOE #1, JANE DOE #1 *
JOHN DOE #1M, et al. *

PLAINTIFFS

* CIVIL CASE NUMBER:

v.

* 8:21-cv-00356-PJM

MONTGOMERY COUNTY BOARD
OF EDUCATION, et al.

* * * * *

RESPONSE TO STANDING ORDER CONCERNING REMOVAL

JOSEPH DOODY, ONE OF THE DEFENDANTS, by KEVIN KARPINSKI and KARPINSKI, CORNBROOKS & KARP, P.A., his attorneys, in response to the Court's Standing Order Concerning Removal states as follows:

1. The date(s) on which each Defendant was served with a copy of the Summons and Complaint.

Defendant Doody was served with the original Complaint asserting negligence on February 28, 2020. On January 15, 2021, Defendant Doody, Montgomery County Board of Education, Casey B. Crouse, Vincent Colbert and Eric Wallich were served with an Amended Complaint, asserting for the first time federal causes of action - - Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681 and claims under 42 U.S.C. § 1983. Jeffery Sullivan, a newly added Defendant, was served on February 10, 2021.

2. In actions predicated on diversity jurisdiction, an indication of whether any Defendants who have been served are citizens of Maryland, and

for any entity that is not a corporation, the citizenship of all members.

Not applicable.

3. If removal takes place more than thirty (30) days after any Defendant was first served with a copy of the Summons and Complaint, the reasons why removal has taken place at this time and the date on which the Defendant(s) was (were) first served with a paper identifying the basis for such removal.

As noted above, Defendants were served with a Complaint filed in the Circuit Court for Montgomery County asserting a simple claim of negligence. On January 15, 2021, Plaintiffs amended their Complaint and filed suit asserting federal causes of action under Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681 and claims under 42 U.S.C. § 1983. The filing of the Amended Complaint was the first time that federal causes of action were asserted. All Defendants consented to and joined in removal of this case to the United States District Court for the District of Maryland within thirty (30) days of being served with a Complaint that asserted a federal cause of action.

4. In actions removed to this Court predicated on diversity jurisdiction in which the action in state court was commenced more than one year before the date of removal, the reasons why this action should not be summarily remanded to state court.

Not applicable.

5. **Identification of any Defendant who was served in the state court action prior to the time of removal who did not formally join in the notice of removal and the reasons why such Defendant did not join.**

None.

Respectfully submitted,

KARPINSKI, CORNBROOKS & KARP, P.A.

BY: /s/ Kevin Karpinski
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CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of February 2021 a copy of the foregoing was electronically filed with notice to:

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